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Upon hearing that the FCC has proposed eliminating the Morse requirement

for radio amateurs, citizens often ask me questions such as "Why are they

downgrading it?" or "Why are they dumbing it down?". In this matter,

WT Docket 05-235, the FCC is abdicating its responsibility as regulator

of the airwaves in three crucial areas: Democracy, Diligence,

and Differentiation.

The branch of Philosophy called Ethics is the study of Right and

Wrong. Reflecting the widespread unfamiliarity with the humanities

often seen in technically educated individuals, the FCC has confused

ethical right with popularity. See, for example, Paragraph 17, "the

majority agree", or Paragraph 18, "numerous  
commenters", or Paragraph 17

again, "the trend", or Paragraph 9, "the largest  
group". I expect wisdom

and good judgement from the FCC, not a popularity  
contest. The widespread

lawbreaking heard in the Citizens Band service is very  
popular, but not

ethically right. The FCC should work for the good of  
our democracy, which

good may not always be democratically popular. This  
NPRM is democratically

flawed.

A second area in which the FCC has erred in this  
NPRM is the area of due

diligence. The FCC has presented, as valid, arguments  
which are obviously

false. FCC in Paragraph 18 agrees with the false  
statement that the Morse

requirement "discourages individuals" from becoming  
radio amateurs. I have

personally examined and certified for licensing  
hundreds of people who had

no Morse ability. Morse does not discourage.

FCC shows lack of due diligence again in Paragraph  
10, when it agrees with

NCVEC that Morse exams "require extensive preparation  
and special equipment".

The "extensive preparation" of Morse exam cassettes is  
far less than that

required for written exam question pools, yet NCVEC  
has no problems with that.

Is a cassette player so high tech ? Rather than  
agreeing with NCVEC, the FCC

should have replied: "We are not amused that NCVEC,  
composed of licencees

supposedly capable of advancing the radio art, should  
complain of the

technical difficulties of administering a Morse exam  
with a cassette deck" .

A third part of the lack of due diligence shown in  
this NPRM by FCC is

the matter of the Morse exam itself. In paragraph 18  
FCC agrees with the

people who think Morse "deserves no greater emphasis" than other modes.

In Paragraph 19, FCC does not like examining people "in one particular

technology". Proper diligence by FCC would show that Morse is the only

examinable technology. FCC knows that Morse exams can show competence in

Morse technology. Let us postulate an exam in voice mode:

Examiner: This is the amateur radio exam for voice operation. Please

state your name and city of residence.

Examinee: My name is Russ Ward from Nashville, Tennessee.

Examiner: Congratulations on passing the amateur radio voice mode exam.

I am sure the exam for digital modes would be equally meaningless.

Since Morse is the mode that can be credibly examined, FCC should take

advantage of that fact to enable more capable licences. The above three

examples of lack of diligence by FCC in preparing the NPRM should certainly

cause FCC to rethink the NPRM.

A third general area of this NPRM in which FCC was lacking is that of

differentiation. FCC agrees with people who say that the Morse exam

has "no purpose" (Paragraph 18), or "no useful purpose" (Paragraph 10),

or is "an unnecessary burden" (Paragraph 10). Previously above, I indicated

that FCC may not have shown sufficient ethical wisdom. Now I will show

how FCC is missing an important chance to show leadership. FCC can show

that the purpose of the Morse exam is to differentiate U.S. radio amateurs

in the areas of Tradition, Challenge, and Pride.

Radio amateurs in the United States have passed much more severe Morse

exams than the current exams. The Morse exam is an

important historical bond

providing a common link with past experience. Our predecessors warned of making

changes "for light and transient reasons" (see Declaration of Independence).

The Morse exam is an important tradition.

Another reason that FCC should provide leadership to differentiate U.S.

radio amateurs is the challenge. The Morse exam is far from being "the

unnecessary burden" of Paragraph 10. The FCC and the radio amateur community

must say, just as President Kennedy said about lunar exploration: "We

choose to do these things, not because they are easy, but because they are

hard". With Morse, as with any worthwhile skill, hard tasks can become easy

pleasures. FCC can give citizens a challenging goal through the Morse exam.

A third reason that FCC should provide leadership to differentiate U.S.

radio amateurs is pride. Even if all other countries in the world should drop

the Morse exam, U.S. amateurs can proudly know that their radio amateurs are

better. Even the existing five word per minute exam can indicate that a person

has shown enough motivation, commitment, and perseverance to pass. That radio

amateur passing the Morse exam can be proud. FCC can differentiate U.S. radio

amateurs through their pride in passing the Morse exam.

By not passing this NPRM, FCC can overcome the mistakes in it in the areas of

democracy and diligence, while differentiating U.S. radio amateurs through

tradition, challenge, and pride.

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